

William R. Bennett, III (WB 1383)
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Attorneys for Defendant
SINORCHES GLOBAL LTD.
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CALDER SEACARRIER CORP.,

07 CV 6520 (LAK)

Plaintiff,

- against -

VIKING MARINE S.A. and SINORICHES GLOBAL
LTD. a/k/a/ SGL SHIPPING LIMITED,

Defendants.

-----X

NOTICE OF MOTION

MOTION BY:

William R. Bennett, III
Bennett, Giuliano, McDonnell & Perrone, LLP
225 West 34th Street, Suite 402
New York, New York 10122
(646) 328-0120
(646) 328-0121 (Fax)

DATE and TIME:

Pursuant to Court Order.

PLACE:

United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SUPPORTING PAPERS:

1. Memorandum of Law

RELIEF DEMANDED:

1. Dismiss Complaint for failure to state a cause of action.
2. Summary Judgment on issue of standing.

Dated: New York, New York
December 26, 2007

Bennett, Giuliano, McDonnell & Perrone, LLP
Attorneys for Defendant Sinoriches Global, Ltd.

A handwritten signature in black ink, appearing to read 'WRB III', is written over a horizontal line.

William R. Bennett, III
494 Eighth Avenue, 7th Floor
New York, New York 10001
Telephone: (646) 328-0120

TO: Garth Wolfson, Esq.
Mahoney & Keane LLP
111 Broadway, 10th Flr.
New York, New York 10006

Richard M. Ziccardi, Esq.
Xylas & Ziccardi, LLP
500 Fifth Avenue
New York, New York 10110

CERTIFICATE OF SERVICE

I, WILLIAM R. BENNETT, III, an attorney duly admitted to practice in the Courts of the State of New York and in this District, hereby certify that on December 26, 2007, I personally caused a copy of the foregoing NOTICE OF MOTION to be served on defendants:

Garth Wolfson, Esq.
Mahoney & Keane LLP
111 Broadway, 10th Flr.
New York, New York 10006

Richard M. Ziccardi, Esq.
Xylas & Ziccardi, LLP
500 Fifth Avenue
New York, New York 10110

by depositing a true copy of same enclosed in a properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.

A handwritten signature in black ink, appearing to read 'WRB III', is written over a horizontal line.

William R. Bennett, III